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Attorneys for Respondent Subject E

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE VARIOUS GRAND JURY SUBPOENAS

12 Misc. 381 (WHP)

**MOTION OF SUBJECT E TO
PURGE CONTEMPT AND VACATE
CONTEMPT CITATION**

TO:

Jared Lenow, AUSA
Katherine Reilly, AUSA
U.S. Attorney's Office
One St. Andrew's Plaza
New York, NY 10007

SIR and MADAM:


PLEASE TAKE NOTICE that the undersigned attorneys for Subject E will move before the Hon. William H. Pauley, III, U.S.D.J., on short notice and at the earliest opportunity, to purge the contempt judgment imposed against Subject E by Order of the Court dated January 24, 2017 (Doc. #60) and to vacate the contempt citation.

PLEASE TAKE FURTHER NOTICE that, in support of this Motion, the undersigned relies upon a memorandum of law and Declaration of Alain Leibman, which will be filed *in camera* and under seal with the Court once permission of the Court to do so is received.

PLEASE TAKE FURTHER NOTICE that in the event of any opposition to this Motion, movant requests a hearing before the Court at the earliest time.

FOX ROTHSCHILD LLP
Attorneys for Subject E

DATED: February 8, 2017

By: 
ALAIN LEIBMAN
Bar # AL8971


CERTIFICATE OF SERVICE

I hereby certify that on this date, the within Motion was served upon by Government via ECF, and that copies of the supporting memorandum of law and Declaration of Alain Leibman, both under seal, will be served upon the Government via email (once approval of the Court for filing *in camera* and under seal is received) to the following persons:

Jared Lenow, AUSA
Katherine Reilly, AUSA

FOX ROTHSCHILD LLP
Attorneys for Subject E

DATED: February 8, 2017

By: 
ALAIN LEIBMAN
Bar # AL8971